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Attorneys for Debtor

UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
LOS ANGELES DIVISION

In re:

PARK PLACE MASTER TENANT, LLC

Debtor.

Case No.: 2:21-bk-17445-WB

Chapter 7

STIPULATION TO AMEND THE  
BRIEFING SCHEDULE ON MOTION TO  
APPROVE COMPROMISE OF  
CONTROVERSY AND TO COMPEL  
TURNOVER OF POSSESSION OF  
ITEMS RELATED TO REAL  
PROPERTY

**HEARING DATE:**

**DATE:** December 16, 2021

**TIME:** 2:00 P.M.

**CTRM:** 1375

TO THE HONORABLE JULIA W. BRAND, UNITED STATES BANKRUPTCY  
JUDGE:

WHEREAS, Rosendo Gonzalez, Chapter 7 Trustee, has filed the CHAPTER 7  
TRUSTEE'S MOTION TO APPROVE COMPROMISE OF CONTROVERSY AND TO  
COMPEL TURNOVER OF POSSESSION OF ITEMS RELATED TO REAL PROPERTY;  
MEMORANDUM OF POINTS AND AUTHORITIES; AND DECLARATION IN SUPPORT  
THEREOF Docket # 41, in this Chapter 7 case (the "Motion");

WHEREAS, Debtor intends to Oppose the Motion, including the possibility of  
opposition in the form of a higher competing offer for the assets that are proposed to be sold as a  
part of the Motion;

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1 WHEREAS, the matter is set for hearing on the court's 2:00 p.m. calendar on December  
2 16, 2021;

3 WHEREAS, pursuant to the Federal Rules of Bankruptcy Procedure and the Local  
4 Bankruptcy Rules, the resulting briefing schedule for the Debtor's opposition to the Motion is  
5 December 2, 2021, and the movant's reply would be due December 9, 2021;

6 WHEREAS, the Debtor's counsel has requested, and the movant's counsel has agreed,  
7 that the briefing schedule for the Motion be amended so that the Debtor's opposition to the  
8 Motion may be filed on December 6, 2021, and that the movant's reply may be filed by  
9 December 13, 2021.

10 Therefore, IT IS HEREBY STIPULATED AND AGREED, and the parties request that  
11 an Order be entered as follows:

- 12 1. Debtor's deadline to file written Opposition to the Motion shall be extended to  
13 **December 6, 2021;**
- 14 2. Movant's deadline to file written Reply shall be extended to **December 13, 2021;**
- 15 3. The parties respectfully request that the Court enter an Order consistent with this  
16 stipulation, which Order is lodged separately and concurrently.

17 IT IS SO STIPULATED.

18 Dated: December 2, 2021

CURD, GALINDO & SMITH, LLP

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20  
21 By: Jeffrey B. Smith  
22 Attorney for Debtor

23  
24 Dated: December 2, 2021

25 LEVENE, NEALE, BENDER, YOO  
26 & GOLUBCHIK, L.L.P.

27 By: Carmela T. Pagay  
28 Attorney for Rosendo Gonzalez  
Chapter 7 Trustee

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In re: PARK PLACE MASTER TENANT, LLC

Chapter: 7

Case Number: 2:21-BK-17445-WB

Debtor(s).

**NOTE:** When using this form to indicate service of a proposed order, **DO NOT** list any person or entity in Category 1. Proposed orders do not generate an NEF because only orders that have been entered are placed on a CM/ECF docket.

### PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

301 E. Ocean Blvd., Suite 1700  
Long Beach, CA 90802

A true and correct copy of the foregoing document described as STIPULATION TO AMEND THE BRIEFING SCHEDULE ON MOTION TO APPROVE COMPROMISE OF CONTROVERSY AND TO COMPEL TURNOVER OF POSSESSION OF ITEMS RELATED TO REAL PROPERTY will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d), and (b) in the manner indicated below:

**I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")**- Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On 12/1/2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email addressed indicated below:

**Hal D Goldflam** hgldflam@frandzel.com, dmoore@frandzel.com

**Rosendo Gonzalez (TR)** rgonzalez@ecf.axosfs.com,  
rossgonzalez@gonzalezplc.com;jzavala@gonzalezplc.com;zig@gonzalezplc.com

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**Reed S Waddell** rwaddell@frandzel.com, sking@frandzel.com

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**Timothy J Yoo** tjy@lnbyb.com

**III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL** (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or LBR, on \_\_\_\_, I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method) by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

12/2/21  
Date

Valerie Phillips  
Type Name

Signature